

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

WILLIE LEE POOLE,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; et al,

Defendants.

CIVIL ACTION NO. 2:05-CV-774

COUNTY OF Madison

STATE OF AL

AFFIDAVIT OF KATHIE ROWELL

PERSONALLY APPEARED before the undersigned officer, duly authorized to administer oaths, Kathie Rowell, who states under oath as follows:

1. My name is Kathie Rowell. The statements made in this declaration are based upon my own personal knowledge as more specifically set forth below and, if sworn as a witness, I could testify competently as to them.

2. I was at one time an employee at the Auburn branch of American General Financial Services, Inc. ("AGFS"), formerly known as American General Finance, Inc. I have not, however, been employed by AGFS since 2000.

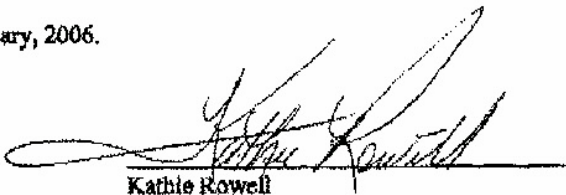
3. At no time did I ever inform customers, including Willie Poole, that credit insurance was required, that credit insurance would improve the customer's chances of obtaining a loan, or that credit insurance would improve a customer's credit score.



4. However, given the amount of time that has passed, I do not remember the details of and cannot testify with any specificity regarding Willie Poole's June 15, 1990 loan with AGFS.

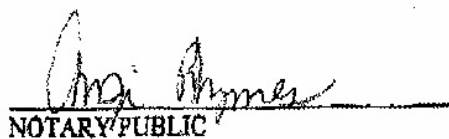
FURTHER AFFIANT SAYETH NOT.

This the 23 day of February, 2006.


Kathie Rowell

SWORN TO AND SUBSCRIBED BEFORE ME, this the 23rd day of February.




NOTARY PUBLIC

My Commission Expires: MY COMMISSION EXPIRES APRIL 14, 2009